

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DR. ORIEN L. TULP,)	
)	
Plaintiff,)	Case No. 2:18-cv-05540-WB
)	
v.)	Hon. Wendy Beetlestone
)	
EDUCATIONAL COMMISSION FOR)	
FOREIGN MEDICAL GRADUATES and DR.)	
WILLIAM W. PINSKY,)	
)	
Defendants.)	

**DECLARATION OF KARA CORRADO IN SUPPORT OF DEFENDANTS' MOTION
TO QUASH SUBPOENA FOR THE APPEARANCE OF DR. WILLIAM W. PINSKY**

I, Kara Corrado, declare as follows:

1. I am currently employed as the Vice President for Operations at the Educational Commission for Foreign Medical Graduates ("ECFMG"). I have been employed in various capacities at ECFMG since 2004.
2. I make this Declaration in connection with the above-captioned action. I have personal knowledge of the facts stated herein and if called as a witness could and would testify to those facts.
3. The subpoena directed to me in the above-captioned action was not delivered to me by personal service. Rather, I understand it was left with ECFMG's receptionist.
4. I understand that subpoenas directed to Dr. William W. Pinsky and Lisa Cover in the above-captioned action were similarly not delivered to Dr. Pinsky or Ms. Cover, respectively, but rather, like the subpoena directed to me, were left with ECFMG's receptionist.
5. The subpoena directed to me was not accompanied by any payment.

6. I understand that the subpoenas directed to Dr. Pinsky and Ms. Cover similarly were not accompanied by any payments.

7. Dr. Pinsky is traveling internationally on business in connection with a preexisting professional commitment, which includes participation at professional events out of the country on January 10 and 11. I understand that Dr. Pinsky's travel plans have been in place since mid-November 2018 and booked since December 2018. Dr. Pinsky is not scheduled to return to the United States until January 12.

8. I plan to attend the hearing scheduled for January 11, 2019 in the above-captioned matter and am familiar with the facts underlying the allegations in Plaintiff's Complaint and Motion for a Preliminary and/or Permanent Injunction.

9. To my knowledge, Dr. Pinsky does not have unique knowledge relevant to the allegations in Plaintiff's Complaint and Motion for a Preliminary and/or Permanent Injunction that I do not have.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

EXECUTED: January 10, 2019


Kara Corrado